

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	) Chapter 11
	)
AS WIND DOWN LLC (f/k/a Avenue	) Case No. 19-11842 (LSS)
Stores, LLC), et al,	)
	) (Jointly Administered)
Debtors.	)
	)
DAVID W. CARICKHOFF, TRUSTEE,	)
	)
Plaintiff,	) Adversary No. 21-50454
v.	)
SOHO APPAREL LTD,	) <b>Re: Docket Nos. 1, 2 and 4</b>
	)
Defendant.	)
	)

**PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT**

Plaintiff, David W. Carickhoff, in his capacity as Chapter 7 Trustee (the “Plaintiff”), for the above-captioned debtors (the “Debtors”) by and through its undersigned counsel, hereby requests that a default be entered against defendant Soho Apparel LTD (“Defendant”), in the above-captioned adversary proceeding based on the details of the *Declaration of Counsel in Support of Plaintiff's Request for Entry of Default* (the “Declaration”) filed concurrently herewith, and the *Adversary Complaint for Avoidance and Recovery Preferential Transfers Pursuant to 11 U.S.C. §§ 547 & 550 and Objection to Scheduled Claims*, with accompanying *Summons* and *Certificate of Service*, attached to the Affidavit as Exhibit 1. A form of *Entry of Default* is attached hereto as **Exhibit A**.

Dated: October 14, 2021

/s/ Peter J. Keane

Bradford J. Sandler (DE Bar No. 4142)  
Andrew W. Caine (CA Bar No. 110345)  
Peter J. Keane (DE Bar No. 5503)  
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*Special Counsel to Plaintiff, David W. Carickhoff,  
Chapter 7 Trustee for the Estates of AS Wind Down  
LLC, et al.*